

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

Ronnie Wayne Booher

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Douglas Dale

"Please See Attached Defendant List"

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 5:22-cv-6014-SRB
(to be filled in by the Clerk's Office)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Ronnie Booher
Street Address	24102 E navajo Trail
City and County	Benson, Pima County
State and Zip Code	Arizona, 85602
Telephone Number	520-686-4886
E-mail Address	ron_boohar@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Douglas Dale
Job or Title (if known)	Owner @ Dale Farming Company
Street Address	609 Vine St.
City and County	Ridgeway, Harrison
State and Zip Code	Missouri, 64481
Telephone Number	660-872-5031
E-mail Address (if known)	

Defendant No. 2

Name	"See Attached Defendant List"
Job or Title (if known)	
Street Address	
City and County	

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

☐ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

"40 C.F.R. § 156.10(i)(2)(ii)", (LC19-1011; 4-11-19), 40 C.F.R. § 152.30(a), (b), (c)(2) or (d),

"7 U.S.C. 136(b)(1)(A)" 7 U.S.C. 136(b)(1)(B) 7 U.S.C. 136(e)(3)]

"40 C.F.R. 152 - 186", 18 U.S. Code § 1113 attempted homicide.; 40 CFR § 170.9 Violations

☐ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

☒ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, (name) Ronnie Booher, is a citizen of the State
of (name) Arizona.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) Dale Farming Company _____, is incorporated under the laws of the State of (name) Missouri _____, and has its principal place of business in the State of (name) Missouri _____. Or is incorporated under the laws of (foreign nation) United States _____, and has its principal place of business in (name) Bethany, Missouri _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

125,000,000 for bodily injury by misuse of pesticides, damaging organs and lost wages.
homelessness, debt accumulation, by spraying Plaintiff; Booher with pesticides.

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?

- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Defendants sprayed and fumigated Plaintiff with various types of pesticides resulting in human injury.
 Most recent events 2017-2020. Fumigation from anhydrous suffocating Plaintiff resulting in Disability.
 Defendants trespassed in the night with the intent to do harm to Plaintiff, Forced to vacate for safety.
 The pesticide farmers showed complete disregard to proper application to prevent human injury.
 No Notice was ever given to vacate the area during the restricted entry interval, resulting in human injury.
 Pesticide Farmers sprayed, when winds favored drift into home while sleeping resulting in human injury.
 Direct involvement by Dale Farming Company, Andrew Callaway Farms and MFA Agri-Services.
 Injuries acquired from Chemical exposure are Sarcoidosis of the Lungs and Lymph-nodes, Head Tremors,
 Brain Damage, Psychosis, Trauma Disorder, Pneumomediastinum, Pneumoperitonium, Liver, Eyes
 Neurological, Respiratory, GI, Cardiac, Kidney involvement or damage.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

I'm seeking relief to recover from financial devastation, debt accrued, lost wages, pain and suffering.

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

(1) 250,000 to replace home in current residing state, (2) 125,000 in accrued debt, (3) 300,000 in Lost Wages,
(4) 300,000 for future wages. (5) 124,025,000. for bodily injuries.,

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 16th, 2022.

Signature of Plaintiff

Ronnie Booher

Digitally signed by Ronnie Booher
Date: 2022.01.16 07:55:23 -07'00'

Printed Name of Plaintiff

Ronnie Booher

Please see attached additional defendants' below.

Defendant No. 2

Company: Andrew Callaway Farms Contact Name: Andrew Callaway Job or Title: Owner of "Andrew Callaway Farms"
Street Address: 32346 W State Highway 13 City and County: Bethany, (Harrison County)
State and Zip Code: Missouri 64424 Telephone Number: (660) 425-7282

The defendant, Andrew Callaway Farms, is incorporated under the laws of the State of Missouri, and as its principal place of business in the State of (Missouri).

Defendant No. 3

Individual Name: Randy Joiner Job or Title: Pesticide Sprayer "Dale Farming Company" Street Address: 604 Vine St.
City and County: Ridgeway (Harrison County) State and Zip Code: Missouri, 64481 Telephone Number: (660) 872-6358

Defendant No. 4

Individual Name: Brian Nail Job or Title: Pesticide Sprayer "MFA Agri Service"
(if known) Street Address: 1201 N 25th St. City and County: Bethany (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 425-7045

Defendant No. 5

Individual Name: Jeff Smith Job or Title: Pesticide Sprayer "Andrew Callaway Farms"
Street Address: 32346 W. State Highway 13 City and County: Bethany, (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 425-7282

Defendant No. 6

Individual Name: Richie Morgan Job or Title: Manager "MFA Agri-Service"
Street Address: 1201 N 25th St. City and County: Bethany, (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 872-6358

Defendant No. 7

Organization/Company: MFA INC. Contact Name: Jason Weirich Job or Title: Vice President: Training Employees "MFA"
Street Address: 201 Young Ray Drive City and County: Columbia (Boone County)
State and Zip Code: Missouri, 65201 Telephone Number: (573) 874-5111

The defendant, MFA INC. is incorporated under the laws of the State of Missouri, and as its principal place of business in the State of (Missouri)

Defendant No. 8

Organization: Gage's Contact Name: Scott Gage Job or Title: Owner "Gages Farming Chemical Supply Company"
Street Address: 31019 East 260th Avenue City and County: Bethany (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 425-3733

The defendant, Gage's, is incorporated under the laws of the State of Missouri, and as its principal place of business in the State of (Missouri)

Defendant No. 9

Organization/Company: Loveland Products Contact Name: Richard Gearheard Job or Title: President "Loveland Products"
Street Address: 14520 Co Rd 64 City and County: Greeley (Weld County) State and Zip Code: Colorado, 80631
Telephone Number: (970) 356-8920

The defendant, Loveland Products, is incorporated under the laws of the State of Colorado, and as its principal place of business in the State of (Colorado)

Defendant No. 10

Company: Corteva Corporation Contact Name: Chuck Magro Job or Title: Chief Executive Officer "Corteva"
Street Address: Chestnut Run Plaza 735 City and County: Wilmington (New Castle County) State and Zip Code: DE, 19805-0735
Telephone Number: (833) 267-8382

The defendant, Corteva Corporation, incorporated under the State of Delaware Laws, principal place of business in State of (Delaware)

Defendant No. 11

Company: Bayer Contact Name: Philip Blake Job or Title: "Bayer Crop Science" Street Address: 100 Bayer Boulevard
City and County: Whippany (Morris County) State and Zip Code: New Jersey, 07981 Telephone Number: (862) 404-3000

The defendant, Bayer Corporation, is incorporated under the laws of the State of New Jersey, and as its principal place of business in the State of (New Jersey)

Defendant No. 12

Company: DUPONT Contact Name: EDWARD D. BREEN Job or Title: VP of Dupont Street Address: 974 CENTRE ROAD
City and County: WILMINGTON State and Zip Code: DELAWARE 19805 Telephone Number: (800) 441-7515

The defendant, "DUPONT", is incorporated under the laws of the State of DELAWARE, and as its principal place of business in the State of (DELAWARE)

Defendant No. 13

The defendant, (Missouri Department of Agriculture) is incorporated under the laws of the State of (Missouri), and has its principal place of business in the State of (Missouri)

Missouri Department Of Agriculture

Contact Name: Christine (Chris) Lynn Chinn Director Home Address: 3937 HWY 151 Clarence Mo 63437

Work Phone: 573-522-1533 Work Address: 1616 Missouri Blvd. Jefferson City Missouri 65102

Defendant No. 14

The defendant, (Harrison County Health Department), is incorporated under the laws of the State of (Missouri), and has its principal place of business in the State of (Missouri)

Corporation: Harrison County Health Department Contact Name: Director Courtney Cross
Address: 1700 Bethany Ave. City and State: Bethany, Missouri 64424

Defendant No. 15

The defendant, (Harrison County Governing Body), is incorporated under the laws of the State of (Missouri), and has its principal place of business in the State of (Missouri)

Organization: Harrison County and Presiding Commission Address: 1505 Main st.

City, State and Zip: Bethany, Missouri 64224 Phone: (660) 425-6424

Presiding Commission: Jack Hodge, Rick Smith, Jim Holcomb

Defendant No. 16

The defendant, (BASF Corporation) is incorporated under the laws of the State of (North Carolina), and its principal place of business is in the State of (North Carolina)

Corporation Name BASF Corporation. Contact Name Craig Kleppe. Job Title: VP of Ag
Street Address 13528 Research Triangle Park, North Carolina 27709

Amended Additional Defendants'

(Drafted 1/23/2022)

Defendant No. 17

Individual Name: STEVEN RUTLEDGE Job or Title: Pesticide Sprayer and Mixer "MFA Agri-Service"
Street Address: 305 North Arch Street City and County: Bethany (Harrison County)
State and Zip Code: New Hampton 64471 Telephone Number: (660) 373-0412

Defendant No. 18

The defendant, Harrison County Community Hospital, is incorporated under the laws of the State of Missouri, and as its principal place of business in the State of (Missouri)

Organization: Harrison County Community Hospital Contact Name: Amy Pickren Job or Title: Director Of Operations
Street Address: 2600 Miller Street City and County: Bethany (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 425-2211

Defendant No. 19

Individual Name: Dr. Kenneth (Chad) Lambert Job or Title: Physician "Bethany Medical Clinic"
Street Address: 31019 East 260th Avenue City and County: Bethany (Harrison County)
State and Zip Code: Missouri, 64424 Telephone Number: (660) 425-3733

Defendant No. 20

Individual Name: Dr. Richard Kimmell Job or Title: Physician "Harrison County Community Hospital"
Street Address: 1600 North 2nd Street City and County: Clinton (Henry County)
State and Zip Code: Missouri, 64735 Telephone Number: (660)-885-6690, (660) 425-2211